

**Version with Markings to Show Changes Made**

1. (Twice Amended) Apparatus to adapt a common telephone for operation as a speakerphone, comprising:

a loudspeaker;

a microphone; and

an audio module adapted for removable interfacing to a handset jack of a base unit of a telephone to adapt said common telephone for operation as a speakerphone;

wherein said audio module is portable for transportation between common telephones.

16. (Twice Amended) A method of converting a common telephone into a speakerphone, comprising:

transporting a portable loudspeaker and a portable microphone to said common telephone;

removing a handset connection between a handset and a base of a telephone; and

temporarily connecting [a] said loudspeaker and [a] said microphone to said handset connection on said base to convert said common telephone into a speakerphone.

20. (Twice Amended) Apparatus for converting a common telephone into a speakerphone, comprising:

means for removing a handset connection between a handset and a base of said telephone; and

means for temporarily connecting a loudspeaker and a microphone to said handset connection on said base to convert said common telephone into a speakerphone;

wherein said loudspeaker and said microphone are portable for transportation between common telephones.

**REMARKS**

Claims 1, 16 and 20 are amended herein. Claims 1-25 remain pending in the application.

The Applicants respectfully request the Examiner to reconsider his earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

**Claims 1, 4, 5, 12, 13, 16 and 20 over Young**

In the Office Action, claims 1, 4, 5, 12, 13, 15, 16 and 20 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by Young U.S. Patent No. 4,682,957 ("Young"). The Applicants respectfully traverse the rejection.

Claims 1, 4, 5, 12, 13 and 15 recite, *inter alia*, an audio module that is portable for transportation between common telephones. Claim 16 recites, *inter alia*, transporting a portable loudspeaker and a portable microphone to a common telephone. Claim 20 recites, *inter alia*, a loudspeaker and a microphone are portable for transportation between common telephones.

Young appears to teach a live presentation composed of audio and video given at one remote location by use of standard telephone service (Abstract). A presentation package is prepared and transmitted in advance of a presentation to the remote location (Young, Abstract). The transmission is by mail, courier or non-realtime electronic transmission (Young, Abstract). Presenting equipment at the remote location is used to connect the remote location to an originating location (Young, Abstract). Oral presentation is transmitted from the originating location to the remote location during the presentation (Young, Abstract). Speakerphone circuitry accepts input signals from a microphone and directs those to a telephone line for transmission to the remote location or from the remote location to a speaker (Young, col. 5, lines 25-33). A switch is used to switch in the speakerphone circuitry once a connection is made with a conventional telephone line to another party (Young, col. 6, lines 47-58).

Young's speakerphone circuitry is switched into and out of operation within the presentation equipment. Young's speakerphone is not portable, nor intended to be transported from one common telephone to another. Young fails to teach an audio module that is portable for transportation between common telephones, transporting a portable loudspeaker and a portable microphone to a common telephone, a loudspeaker and a microphone are portable for transportation between common telephones, as respectively claimed by claims 1, 4, 5, 12, 13, 15, 16 and 20.

Accordingly, for at least all the above reasons, claims 1, 4, 5, 12, 13, 15, 16 and 20 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 2, 3, 14, 17-19 and 21-23 over Young in view of Norris**

In the Office Action, claims 2, 3, 14, 17-19 and 21-23 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Young in view of Norris U.S. Patent No. 4,930,156 ("Norris"). The Applicants respectfully traverse the rejection.

Claims 2, 3, 14, 17-19 and 21-23 are dependent on claims 1, 16 and 20 respectively, and are allowable for at least the same reasons as claims 1, 16 and 20.

Claims 2, 3 and 14 recite, *inter alia*, an audio module that is portable for transportation between common telephones. Claims 17-19 recite, *inter alia*, transporting a portable loudspeaker and a portable microphone to a common telephone. Claims 21-23 recite, *inter alia*, a loudspeaker and a microphone are portable for transportation between common telephones.

As discussed above, Young fails to teach an audio module that is portable for transportation between common telephones, transporting a portable loudspeaker and a portable microphone to a common telephone, a loudspeaker and a microphone are portable for transportation between common telephones, as respectively claimed by claims 2, 3, 14, 17-19 and 21-23.

Norris appears to teach a telephone speaker/microphone device for suspending in a user's ear to enable hands-free communication (Abstract).

Control circuitry interconnects a microphone and speaker leads from a telephone to a speaker element and microphone element in a single earpiece (Norris, Abstract).

Norris teaches an earpiece for telephone communication. Norris fails to even mention a speakerphone, much less portability allowing transportability between common telephones..

Neither Young nor Norris, either alone or in combination, disclose, teach or suggest an audio module that is portable for transportation between common telephones, transporting a portable loudspeaker and a portable microphone to a common telephone, or a loudspeaker and a microphone are portable for transportation between common telephones, as respectively claimed by claims 2, 3, 14, 17-19 and 21-23.

Accordingly, for at least all the above reasons, claims 2, 3, 14, 17-19 and 21-23 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

#### **Claims 6-11 over Young in view of Eppler**

In the Office Action, claims 6-11 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Young in view of Eppler Jr. et al. U.S. Patent No. 5,600,714 ("Eppler"). The Applicants respectfully traverse the rejection.

Claims 6-11 are dependent on claim 1, and are allowable for at least the same reasons as claim 1.

Claims 6-11 recite, *inter alia*, an audio module that is portable for transportation between common telephones.

As discussed above, Young fails to teach an audio module that is portable for transportation between common telephones, as claimed by claims 6-11.

Eppler appears to teach the addition of a hybrid echo canceler into a conventional speakerphone (Eppler, Abstract; Fig. 2).

Eppler's speakerphone circuitry is pre-configured with permanent hardwired circuitry. Eppler fails to teach any type of portability, much less an

audio module that is portable for transportation between common telephones, as claimed by claims 6-11.

Neither Young nor Eppler, either alone or in combination, disclose, teach or suggest an audio module that is portable for transportation between common telephones, as claimed by claims 6-11.

Accordingly, for at least all the above reasons, claims 6-11 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claim 15 over Young in view of McDuffee**

In the Office Action, claim 15 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Young in view of McDuffee U.S. Patent No. 6,002,945 ("McDuffee"). The Applicants respectfully traverse the rejection.

Claim 15 is dependent on claim 1, and is allowable for at least the same reasons as claim 1.

Claim 15 recites, *inter alia*, an audio module that is portable for transportation between common telephones.

As discussed above, Young fails to teach an audio module that is portable for transportation between common telephones, as claimed by claims 15.

McDuffee appears to teach a radio frequency two-way electronic communications device incorporating features of both a mobile pager and a cellular phone (Abstract).

McDuffee fails to even mention a speakerphone.

Neither Young nor McDuffee, either alone or in combination, disclose, teach or suggest an audio module that is portable for transportation between common telephones, as claimed by claim 15.

Accordingly, for at least all the above reasons, claim 15 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

**Claims 24 and 25 over Young in view of Norris, Eppler and McDuffee**

In the Office Action, claims 24 and 25 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Young in view of Norris, Eppler and McDuffee. The Applicants respectfully traverse the rejection.

The Applicants respectfully suggest that the need to combine as many as four (4) separate patents to allegedly arrive at the presently claimed invention is evidence of the non-obviousness of the present invention.

Claims 24 and 25 recite, *inter alia*, a communication device having a voice paging mode of operation and a speakerphone mode of operation.

As discussed above, Young appears to teach a live presentation composed of audio and video given at one remote location by use of standard telephone service (Abstract). A presentation package is prepared and transmitted in advance of a presentation to the remote location (Young, Abstract). The transmission is by mail, courier or non-realtime electronic transmission (Young, Abstract). Presenting equipment at the remote location is used to connect the remote location to an originating location (Young, Abstract). Oral presentation is transmitted from the originating location to the remote location during the presentation (Young, Abstract). Speakerphone circuitry accepts input signals from a microphone and directs those to a telephone line for transmission to the remote location or from the remote location to a speaker (Young, col. 5, lines 25-33).

As discussed above, Norris appears to teach a telephone speaker/microphone device for suspending in a user's ear to enable hands-free communication (Abstract). Control circuitry interconnects a microphone and speaker leads from a telephone to a speaker element and microphone element in a single earpiece (Norris, Abstract).

As discussed above, Eppler appears to teach the addition of a hybrid echo canceler into a conventional speakerphone (Eppler, Abstract; Fig. 2).

As discussed above, McDuffee appears to teach a radio frequency two-way electronic communications device incorporating features of both a mobile pager and a cellular phone.

None of the cited prior art teaches or suggests a communication device having two modes of operation, one of which is a speakerphone mode, much less a communication device having a voice paging mode of operation and a speakerphone mode of operation, as claimed by claims 24 and 25.

Neither Young, Norris, Eppler nor McDuffee either alone or in combination, disclose, teach or suggest a communication device having a voice paging mode of operation and a speakerphone mode of operation, as claimed by claims 24 and 25.

Accordingly, for at least all the above reasons, claims 24 and 25 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

### **Conclusion**

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,



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